

U.S. Department of Justice

Washington, DC 20530

Registration Statement**Pursuant to the Foreign Agents Registration Act of
1938, as amended**

I--REGISTRANT**1. Name of Registrant**

Actum International UK Limited

2. Registration Number (To be assigned by the FARA Unit)

7033

3. Primary Business Address

91 Jermyn Street, First Floor, London, England, UNITED KINGDOM SW1Y6JB

4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Nationality

(c) Year of birth

(d) Present citizenship

(e) If present citizenship not acquired by birth, state when, where and how acquired

(f) Occupation

5. If the registrant is not an individual, furnish the following information:(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐Corporation ☒Other (*specify*) _____

(b) Date and place of organization 03/09/2015, Cardiff, Wales, UK

(c) Name of responsible individual Kirill Goncharenko
(e.g., officer, director or partner)(d) Other business address(es), if any, including
locations of branch or local offices

(e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
Kirill Goncharenko	On File With DOJ	UNITED STATES	Director, President
Morris Reid	On File With DOJ	UNITED STATES	Director, Secretary
Kieran Mahoney	On File With DOJ	UNITED STATES	Director

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
See Appendix for Response		

(h) Describe the nature of the registrant's regular business or activity.

Public Policy, Government Relations, and Media Consulting

(i) Give a complete description of the ownership and control structure of the registrant.

Actum International UK Limited is owned (100%) by Highstake 11 LLC (n/k/a Actum UK Opco LLC) (a DE Limited Liability Company), which is owned (100%) by MSGDMNSM Ventures V LLC (n/k/a/ Actum UK Holding LLC) (a DE Limited Liability Company), which is owned by Kieran Mahoney, Morris Reid, Kirill Goncharenko, Fabian Nunez, Michael McKeon, Mike Dumaine, Thomas Doherty, and Vin Weber. The Parent is controlled by its directors and the members of the Parent.

6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
See Appendix for Response			

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal

Foreign Principal Address

See Appendix for Response

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes ☐

No ☒

If yes, describe fully.

Foreign Principal

Activities/Services

IV--FINANCIAL INFORMATION

9. (a) RECEIPTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register² under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise?

Yes ☐

No ☒

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.³

Foreign Principal	Date Received	From Whom	Purpose	Amount
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¹ The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

² An agent must register within 10 days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁴ under FARA, has the registrant received anything of value⁵ other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register⁶ under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes ☐No ☒

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount
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(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁷ under FARA, has the registrant disposed of any thing of value⁸ other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of the registrant's obligation to register⁹ under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

V--INFORMATIONAL MATERIALS¹⁰

11. Prior to the time of filing this statement,¹¹ has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes ☒ No ☐

If yes, identify each foreign principal and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type
Government of Ethiopia	Yes	Social Media Website URL(s)
Government of National Unity of Libya	Informational Materials are being mailed	
African Development Bank	Informational Materials are being	

12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes ☒ No ☐

(b) If yes, identify each foreign principal and respond to the remaining items in this section.

African Development Bank; Ministry of Foreign Affairs and International Trade of Zimbabwe; Government of Ethiopia; Government of National Unity of Libya

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes ☐ No ☒

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)
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15. Activities in preparing or disseminating informational materials will include the use of the following:

☒ Magazine or newspaper ☒ Advertising campaigns ☒ Press releases ☒ Pamphlets or other publications
☒ Lectures or speeches ☒ Radio or TV broadcasts ☐ Motion picture films ☒ Letters or telegrams
☒ Email
☒ Website URL(s): undetermined; undetermined; undetermined; undetermined
☒ Social Media website URL(s): undetermined; undetermined; undetermined; undetermined
☐ Other (specify) _____

¹⁰ The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

¹¹ See Footnote 2, on page 3.

<input checked="" type="checkbox"/> Public officials	<input type="checkbox"/> Civic groups or associations
<input checked="" type="checkbox"/> Legislators	<input type="checkbox"/> Libraries
<input checked="" type="checkbox"/> Government agencies	<input type="checkbox"/> Educational groups
<input checked="" type="checkbox"/> Newspapers	<input checked="" type="checkbox"/> Nationality groups
<input checked="" type="checkbox"/> Editors	<input type="checkbox"/> Other (<i>specify</i>)

☒ English ☐ Other (*specify*) _____

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

/s/Morris Reid

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EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

10/29/21Morris L. ReilMorris L. Reil

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears and affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

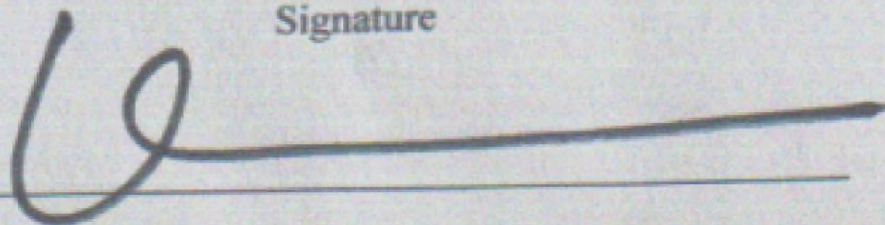
Date

Printed Name

Signature

1/1/21

Kirill Goncharenko



Appendix
Response to Item 5(g)

Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Person	Foreign Principal(s)	Services
Morris Reid	Ministry of Foreign Affairs and International Trade of Zimbabwe	Strategic consulting, government relations, lobbying, and media relations consulting and management services.
	Government of Ethiopia	Strategic consulting, government relations, lobbying, and media relations consulting and management services.
	Government of National Unity of Libya	Strategic consulting/management, lobbying, government relations, including outreach to United States officials, and public affairs.

Appendix

Response to Item 6

Item 6: List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Nature of Services
Katie Gregory	On File With DOJ	Government of National Unity of Libya	Strategic communications and media relations consulting.
Molly Toomey	On File With DOJ	Government of National Unity of Libya	Strategic communications and media relations consulting.
Molly Toomey	On File With DOJ	African Development Bank	Investor engagement, international relations, and event marketing and support.
Timothy Sculthorpe	On File With DOJ	Government of National Unity of Libya	Public relations consulting and support.
Timothy Sculthorpe	On File With DOJ	African Development Bank	Investor relations services, and event marketing and support.
Toby Denselow	On File With DOJ	Government of National Unity of Libya	Assisting with public relations campaign.
Vladislava Galan	On File With DOJ	Ministry of Foreign Affairs and International Trade of Zimbabwe	Registrant's services are anticipated to include strategic consulting, government relations, and lobbying.
Zara Baker	On File With DOJ	Government of National Unity of Libya	Providing media relations and government relations consulting services.
Zara Baker	On File With DOJ	African Development Bank	Providing media relations and government relations consulting services.
Alexander Walker	On File with DOJ	Ministry of Foreign Affairs and International Trade of Zimbabwe	Media relations services, including print, television, radio, and digital messaging and outreach to U.S. media.
Alexander Walker	On File with DOJ	Government of Ethiopia	Media relations services, including print, television, radio, and digital messaging and outreach to United States media.
Benjamin Britworth Collier	On File With DOJ	Government of National Unity of Libya	Providing media relations consulting and management services.
George Eli Birnbaum	On File With DOJ	Ministry of Foreign Affairs and International Trade of Zimbabwe	Strategic consulting and management, public affairs, and government relations services to the principal, including outreach to U.S. government officials.
Thomas Jock McMillan	On File With DOJ	Ministry of Foreign Affairs and International Trade of Zimbabwe	Advising principal regarding digital strategies and performing related services.
Thomas Jock McMillan	On File With DOJ	Government of Ethiopia	Advising principal regarding digital strategies and performing related services.
Thomas Jock McMillan	On File With DOJ	Government of National Unity of Libya	Advising principal regarding digital strategies and performing related services.
Miran Hassan	On File With DOJ	Government of National Unity of Libya	Strategic consulting and media relations regarding issue relevant to the principal.
William Ogborn	On File With DOJ	Ministry of Foreign Affairs and International Trade of Zimbabwe	Strategic consulting, lobbying, public affairs, and government relations, including outreach to United States officials.
William Ogborn	On File With DOJ	Government of Ethiopia	Government relations, including outreach to United States officials.

Appendix

Response to Item 7

Item 7: List every foreign principal for whom the registrant is acting or has agreed to act.

Foreign Principal	Foreign Principal Address
Ministry of Foreign Affairs and International Trade of Zimbabwe	P.O. Box 4240, Munhumutapa Building, Samora Machel, Sam Nujoma Street Harare ZIMBABWE
Government of Ethiopia	United States Embassy of Ethiopia, 3506 International Drive, N.W. Washington, DC 20008
Government of National Unity of Libya	Tarik al Seka, Ben Ashour District Tripoli, Libya LIBYA
African Development Bank	Avenue Joseph Anoma, 01 B.P. 1387 Abidjan, Ivory Coast COTE D'IVOIRE (IVORY COAST)